

**UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF VERMONT**

In re:)	
)	
CORY W. O'DELL and)	Case No. 07-10809
DANIELLE ABARE-O'DELL)	Chapter 13
Debtors)	

OBJECTION TO AFFIDAVIT OF DEFAULT

Debtors, Corey O'Dell and Danielle Abare-O'Dell, by and through their attorney, Rebecca A. Rice, Esq., object to the Affidavit of Default filed by Universal Mortgage Corporation as debtors believe the payments are current on their payments both their mortgage payments under the Order and outside the Plan. Debtors will be providing the mortgagee with proof of their payments.

Further, Debtors have equity in the property and the property is necessary for an effective reorganization.

For the foregoing reasons, this Court must deny the Motion for Relief from Stay filed by Universal Mortgage Corporation as set forth in the Affidavit of Default.

Dated at City of Rutland, Vermont this 2nd day of July, 2008.

CORY W. O'DELL
DANIELLE ABARE-O'DELL

COHEN & RICE

By: /s/Rebecca A. Rice
Rebecca A. Rice, Esq.

CERTIFICATE OF SERVICE

I hereby understand that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) generated in connection with this document and paper copies will be sent to those indicated as non-registered participants on July 2, 2009 at the following addresses:

N/A

/s/Rebecca A. Rice
Rebecca A. Rice, Esq.